

**REMARKS**

Claims 1-6, 8, 11, 13 and 17-26 are pending in the application.

Claims 1-6, 8, 11, 13 and 17-26 have been rejected.

Claims 1-3, 6, 8, 11, 13, 17-19 and 22-24 have been amended.

Unless otherwise specified in the below discussion, Applicants have amended the above-referenced claims in order to provide clarity or to correct informalities in the claims. Applicants further submit that, unless discussed below, these amendments are not intended to narrow the scope of the claims. By these amendments, Applicants do not concede that the cited art is prior to any invention now or previously claimed. Applicants further reserve the right to pursue the original versions of the claims in the future, for example, in a continuing application.

**Rejection of Claims Under 35 U.S.C. §102**

Claims 1-4, 6, 8, 11, 13, 17-20 and 22-25 stand rejected under 35 U.S.C. §102(e) as purportedly being anticipated by U.S. Patent No. 6,591,272, issued to Williams ("Williams"). Applicants traverse this rejection.

Independent Claims 1, 6, 11, 17 and 22, as amended, each contain claim limitations of substantially the following form:

receiving input data comprising one or more integration object instances,  
wherein

an integration object comprises a schema of a set of data, wherein

the schema comprises a plurality of integration object components,

the plurality of integration object components are hierarchically  
related,

the plurality of integration object components comprises first and second integration object components, and

the second integration object component is a child component of the first integration object component, and

an integration object instance comprises data organized in a structure defined by the integration object, wherein

the data is extracted from a first database,

the data comprises a first and second integration object instance component each respectively corresponding to the first and the second integration object component.

*See, e.g., Claim 1 (amended).* Applicants respectfully submit that the cited sections of Williams fail to provide disclosure of these claim limitations. The section of Williams cited against the original "receiving input data" limitation, provides purported description of SQL, its purpose to define database elements, and its syntax.

Structured Query Language or "SQL" is used to define database elements, consisting, but not limited to: tables, columns with tables, data types of columns, relationships between tables, constraints of numerous types, and to perform queries upon and to also perform create, update, delete operations upon the aforementioned elements.

Williams 2:48-53. This section does not describe the input data of the amended claims, which is a plurality of integration object instances defined by a structure described by an integration object. As claimed, and as described in the present Application, integration objects are not SQL or created by SQL. Instead integration objects comprise a schema of integration object components which are hierarchically related. Further, integration object instances are also not SQL, but are instead data organized in a structure defined by the integration object. These integration object instances include data extracted from a database. *See, e.g., Application, ¶¶ [24], [26], [32] and Fig. 1; see also U.S. Provisional Application No. 60/283,713, Exh. C, pp.2-4 – 2-5 (describing integration objects and integration object instances).*

Merely because the cited section provides that one can purportedly use SQL to “perform create, update, delete operations” upon database elements, does not provide the richness of the separate structures of claimed integration objects and integration object instances, which comprise the claimed received input data. Nor does the cited section implicitly provide for the claimed input data structures which are not themselves disclosed to be a database. Further, the section of the Application cited by the Office Action in response to Applicants’ previous discussion actually reinforces Applicants’ present discussion. This is because the Application discloses that the external data is converted into the claimed integration object/integration object instance structure. It is this structure, not the database itself, that is the received input data. The Office Action provides no citation to any section of Williams that discloses, explicitly or implicitly, the claimed input data structure having both an integration object and integration object instances.

The Office Action further suggests that Williams’ PRO-OBJECTS are an integration object. *See* Office Action, p.9 (citing Williams 29:23-26). The cited section merely states “PRO-OBJECTS and their support classes were designed to run along side of the existing legacy applications from day one and share the same databases in real time.” Applicants respectfully submit that the cited section provides no indication of what a PRO-OBJECT is or its structure. There is further no indication that a PRO-OBJECT is usable as input data or to provide an input data schema, as claimed. Thus, there is no connection made by the Office Action to the integration object / integration object instance as those structures are used in the claims. This is a requirement to find anticipation as suggested by the Office Action. At best, the Office Action has provided a vague suggestion of such usability. Applicants therefore request the Examiner provide

specific examples from within the large specification of Williams that supports the Office Action's contention that a PRO-OBJECT can serve the claimed purpose of the integration object or integration object instance.

Claims 1, 6, 11, 17 and 22, as amended, each further contain claim limitations of substantially the following form: "comparing a first database record with the first integration object component." *See* Claim 1 (as amended). The cited sections of Williams fail to provide disclosure of this limitation. As an initial matter, as indicated above, Williams does not disclose integration object components and, therefore, cannot disclose comparing the claimed first integration object component with a first database record.

The Office Action cites to a section of Williams that purportedly discusses "the process of interrogation of relational database schema or catalogs" (Office Action, p.4), but this is not disclosure of the claimed "finding a first database record by comparing the first integration object with the first database record." Database interrogation relates to constructing and executing searches or queries on a database. Mere interrogation of a relational database does not provide for matching of data within the relational database and information found within an integration object (which itself is not disclosed in the cited sections of Williams), nor does mere interrogation provide for the claimed "comparing."

The Office Action also cites to a section of Williams related to using software "to map objects from relations and data in relational database management systems or vice versa to object oriented applications." Office Action, p.5 (citing Williams 3:3-5). Applicants respectfully submit that the disclosed purported "map" does not provide

“comparing” and matching, as claimed, and in fact, Williams provides little-to-no detail regarding this “map,” which is, at best, ancillary to the overall disclosure of Williams.

The Office Action attempts to remedy this deficiency of Williams by suggesting that since the broad purported purpose of Williams is “modifying a database of hierarchical information with information from another database of hierarchical information” (a proposition with which Applicants do not necessarily agree), then Williams discloses all methods of performing such a function. Applicants respectfully submit that the Office Action fails to establish that the stated purpose of Williams is indeed disclosed by Williams, since the cited sections of Williams do not provide any disclosure of such modifying. Further, even were the purpose of Williams as stated, Williams must provide disclosure of the limitations of the claims under 35 U.S.C. § 102, which Applicants have shown Williams fails to do.

Claims 1, 6, 11, 17 and 22, as amended, each also contain claim limitations of substantially the following form:

- finding one or more child database records associated with the first database record, and
- modifying one or more of the child database records using the information associated with the second integration object instance component, if the second integration object component comprises a record matching a corresponding record in the one of the one or more child database records.

Claim 1 (as amended). Applicants respectfully submit that the cited sections of Williams do not provide disclosure of these claim limitations. As an initial matter, as stated above, Williams does not provide disclosure of input data comprising integration objects that are hierarchically related to one another, as claimed. Without such an input data hierarchy, there can be no disclosure of the claimed “second integration object instance component” or “second integration object component” which “is a child object of the first integration

object component.” Therefore, Williams cannot provide disclosure of modifying a child database record with information associated with the second integration object instance component, which is related to the second integration object component.

In addition, the cited sections of Williams do not provide disclosure of matching records from a child input data record to a child of the database record. The first cited section of Williams merely provides purported disclosure of using “software to map objects from relations and data in relational database management systems or vice versa to object oriented applications.” *See* Office Action, pp.5 (citing Williams 3:3-5). This section provides no disclosure of the claimed matching, modifying or finding. The second cited section discusses the purported purpose of the mechanism provided in Williams, but does not provide any disclosure of finding or matching, as claimed. *See* Williams 5:34-38 (“The present invention also relates to a method of communication of changes to existing objects from client computers and their conversion into updates to one or more rows so as to modify the rows of the appropriate tables in the corresponding databases in transactional mode.”).

Finally, Claims 1, 6, 11, 17 and 22, as amended, each further contain claim limitations of substantially the following form:

inserting a new database record comprising the information associated with the second integration object instance component, if the second integration object component does not comprise a record matching a corresponding record in one of the one or more child database records, wherein

the one or more child database records comprises the new database record.

Claim 1 (as amended). The cited sections of Williams fail to provide disclosure of these claim limitations. The cited sections provide disclosure of purportedly inserting a object using “OSFORBStream” and “OSFGenerate” routines, but neither the cited sections nor

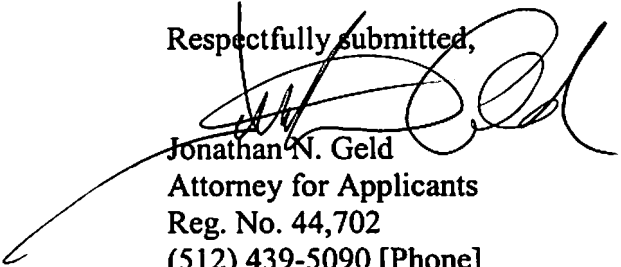
the Office Action provide any indication of how elements of these passages relate to any of the previously discussed purportedly corresponding elements. *See, e.g.*, Office Action, p.5 (citing Williams 14:2-4, 25:57-61). Further, neither of these sections provide disclosure of attempting a matching and then performing inserting a new database record in response to failing to match. *See also, e.g.*, Williams 8:49-9:15 (describing a method purportedly using the OSFORBStream module to transmit information over a network with reduced network requests).

For at least these reasons, Applicants submit that Williams fails to provide disclosure of all limitations of independent Claims 1, 6, 11, 17 and 22, as amended, and all claims depending therefrom (Claims 2-5, 8, 13, 18-21, and 23-26) and that these claims are in condition for allowance. Therefore, Applicants respectfully request the Examiner's reconsideration and withdrawal of the rejections as to these claims and an indication of the allowability of same.

**CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5090.

Respectfully submitted,



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